



January 23, 2018

SENT VIA EMAIL (R3_RA@EPA.GOV)

Cosmo Servidio, Regional Administrator
US EPA Region 3
Mail Code: 3RA00
1650 Arch Street
Philadelphia PA 19103-2029

Dear Administrator Servidio:

The HRSD Sustainable Water Initiative for Tomorrow (SWIFT) is nearing its next major milestone, completion of the SWIFT Research Center (SWIFTRC), which includes a demonstration-scale advanced water treatment facility and recharge well (1 MGD). This demonstration project will set the stage for full-scale SWIFT implementation at multiple HRSD facilities, ultimately providing more than 100 MGD of SWIFT Water to recharge the stressed Potomac Aquifer and improve groundwater sustainability in eastern Virginia.

We have been working closely with Mr. Mark Nelson in Region 3's Underground Injection Control Program. In accordance with those discussions, HRSD is submitting this Underground Injection Control Inventory Information Package (UIC-IIP) for Region 3's consideration in authorizing recharge operations at the SWIFTRC. The UIC-IIP is designed to address key questions raised by EPA regarding the SWIFTRC as well as provide more in-depth background and technical information about the project. Aquifer recharge is expected to begin in early April. Through our discussions with Mr. Nelson, we anticipate that recharge operations at the SWIFTRC will be permitted by rule whereas HRSD's full-scale facilities will require individual permits. HRSD's first full-scale facility will begin construction in 2020. Accordingly, HRSD plans to submit an application for its first individual permit in early 2019.

The UIC-IIP provided today represents a collaborative effort by key stakeholders. Initial review of the UIC-IIP was conducted by the Virginia Department of Health (VDH) and the Virginia Department of Environmental Quality (VDEQ). HRSD worked directly with VDH in an iterative process to identify the SWIFT Water quality requirements as well as the aquifer monitoring objectives. Once we achieved concurrence with our state partners on the UIC-IIP, HRSD submitted the package for additional review by the National Water Research Institute's (NWRI) Independent Advisory Panel, convened for the purposes of evaluating the SWIFT program as well as a parallel academic review from representatives of several of Virginia's public universities. NWRI Panel and academic review comments are included for your reference in the UIC-IIP.

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As Virginia is not a delegated state for the UIC program, the SWIFT program will be permitted directly by EPA. While EPA's UIC permitting program is protective of public health and the environment, some of our stakeholders believe that additional monitoring and oversight at the state level will further enhance public confidence. To achieve this, a bill has been introduced in the 2018 Virginia General Assembly providing for the creation of the Potomac Aquifer Recharge advisory board and monitoring laboratory. The bill not only provides the mechanism to guide State oversight for ensuring appropriate public health and environmental protections, but it also creates an opportunity for additional monitoring, data synthesis and analysis, and a holistic review of the SWIFT program and the Potomac Aquifer to ensure its sustainable management. The advisory board, as proposed, includes a non-voting ex officio seat for EPA Region III as well as a representative from the USGS. This type of collaborative approach between the federal program and state oversight is critical for providing public confidence in the management of the SWIFT program and the measures in place to ensure protection of the aquifer for future generations.

SWIFT has garnered broad support at both the regional and state level. From the Commonwealth's perspective, SWIFT is recognized as a key element for improving the sustainability of groundwater supplies and was acknowledged as such in two legislatively-prompted evaluations of Virginia's groundwater supply:

- Virginia's Joint Legislative and Audit Review Commission report "The Effectiveness of Virginia's Water Resource Planning and Management" (<http://jlarc.virginia.gov/water-2016.asp>)
- Eastern Virginia Groundwater Management Advisory Committee's final report.
<http://www.deq.virginia.gov/Programs/Water/WaterSupplyWaterQuantity/EasternVirginiaGroundwaterManagementAdvisoryCommittee.aspx>

Protecting public health and the underground sources of drinking water for future generations is a shared interest of all parties involved. We have left no stone unturned in our deliberate approach to SWIFT implementation including broad outreach and involvement of national technical experts from a wide variety of disciplines. These extensive efforts will continue to be augmented by our ongoing coordination with EPA and the Potomac Aquifer Recharge advisory board during the demonstration-scale operations of the SWIFTRC and ultimately the full-scale, 100 MGD+ program.

SWIFT is integrated with the Regional Wet Weather Management Plan we submitted on September 29, 2017 as required by our Consent Decree (Civil Action No. 2:09-cv-481). It is this integration that allows HRSD to pursue SWIFT in coordination with our wet weather capacity investments and prioritize these investments to ensure the region's environmental concerns are appropriately sequenced so as to implement the projects and activities that will achieve the most significant environmental benefits first.

Both SWIFT and our wet weather plans necessitate considerable coordination with USEPA Region 3. Accordingly, I invite you to visit me in Hampton Roads to get a first-hand look at SWIFT, HRSD and the innovative culture we have created to address some of the most pressing environmental issues of our time. If your schedule will not permit a visit in the coming weeks, I will reach out to find a time when I can come visit you in Philadelphia to bring you up to speed on SWIFT and our integrated planning approach for sanitary sewer overflow control and wet weather capacity.

Finally, I would ask you to save the date of April 20, 2018 when we will dedicate our SWIFT Research Center in Suffolk, Virginia. This \$23 million dollar facility will add advanced water treatment processes to treat one-million gallons per day of effluent from our Nansemond Wastewater Treatment Plant to meet drinking water standards and pump that SWIFT Water into the ground (in accordance with EPA's UIC permit). We have tentatively scheduled the dedication to begin at 10 am and would be honored to have you in attendance.

Congratulations on your appointment. I look forward to meeting you soon. Please do not hesitate to call anytime if I can be of assistance on any issue. I can be reached by cell phone at 757-274-7904 or by email at thenifin@hrsd.com.

Respectfully,



Ted Henifin, P.E.
General Manager

Attachment: UIC-IIP at https://www.dropbox.com/sh/vfdl6z3403sk0p0/AADVcn01D2reJOZexVsWZWC_a?dl=0

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